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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SOTERO GARCIA CHAVEZ,

Civil No. 3:22-cv-00107-IM

Plaintiff,

vs.

UNITED STATES OF AMERICA ET
AL.,

Defendants.

DECLARATION OF JOSEPH SUAREZ IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION TO EXTEND DISCOVERY AND
OTHER PRETRIAL DEADLINES

Joseph Suarez declares as follows:

1. I am one of the attorneys for Plaintiff in this case. I make this Declaration to support of Plaintiff's unopposed motion to extend the pretrial dates.
2. The Motion accompanying this Declaration is the first request for extension of pretrial deadlines in this action.
3. No trial date has been set.
4. On March 15, 2023, counsel for Plaintiff and County Defendants held the Initial Conference of Counsel for Discovery Planning pursuant to L.R. 26-1.
5. On March 22, 2023, the Rule 16(b) planning and scheduling conference was held.
6. On April 4, 2023, Plaintiff served his initial discovery requests.
7. By May 1, 2023, parties exchanged their initial disclosures per FRCP 26(a)(1).
8. On May 5, 2023, County Defendants responded to Plaintiff's discovery requests. Counsel for Counsel Defendants indicated that County Defendants will supplement the initial production and is unable to provide an exact timeline due to the number of documents to review.
9. Counsel for Plaintiff attempted to schedule depositions in June 2023 but Counsel for County Defendants suggested that depositions be scheduled in mid-July 2023 based on his involvement in other cases between now and mid-July 2023, deponents' schedules, and ongoing production.
10. Parties have tentatively scheduled depositions for the week of July 17 and July 24, 2023.

11. Plaintiff has made a good faith effort to complete discovery in a reasonable period of time. Plaintiff has not been able to complete discovery and requests sixty additional days to do so.

12. Counsel for County Defendants does not oppose this motion.

I declare under penalties for perjury of the laws of the United States that the foregoing is true and correct.

DATED this 13th day of June 2023.

/s/Joseph Suarez
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